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Department of Toxic Substances Control

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August 17, 2006

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CONDITIONAL APPROVAL, FINAL OPERABLE UNIT CARBON TETRACHLORIDE PLUME GROUNDWATER REMEDIAL INVESTIGATION/FEASIBILITY STUDY, FORMER FORT ORD, CALIFORNIA

Dear Ms. Youngblood:

The Department of Toxic Substances Control (DTSC) has reviewed the *Final Operable Unit Carbon Tetrachloride Plume, Groundwater Remedial Investigation/ Feasibility Study (OUCTP RI/FS), Volumes I-V, Former Fort Ord, California* dated May 19, 2006. The document was prepared by MACTEC Engineering and Consulting, Inc. for the Department of the Army Corps of Engineers, Sacramento District. This document presents groundwater site characterization data to define the lateral and vertical extent of carbon tetrachloride plumes in three aquifers, a human health risk assessment, an evaluation of several remedial alternatives and presents the recommended remedial alternative for each aquifer. The responses to regulatory comments on the draft and draft final documents were provided in Volumes IV and V.

The Army adequately addressed DTSC comments on the draft and the final RI/FS, but the following items are reiterated for future consideration during the remedial design phase of the project.

A) DTSC is concerned with the inconsistencies which remain between the OU1 and OUCTP conceptual site models (CSM). A comparison of the most recent geologic and hydrogeologic interpretations contained in the Final RI/FS with those interpretations provided for OU1 found that the Army continues to provide DTSC with two separate interpretations for the same data. Additional data to fill all data gaps should be obtained during the remedial design and implementation phases and be integrated into one comprehensive CSM for both OU 1 and OUCTP.

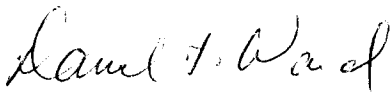
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B) A potential indoor air risk (as calculated from modeling) from the potential pathway of carbon tetrachloride vapors offgassing from the center and down gradient portions of the groundwater plume was documented in Volume V (Comments and Response on Draft Final) of the Final OUCTP RI/FS. Although DTSC understands the CT in groundwater will be remediated, DTSC requests the Army to propose baseline and periodic CT soil gas monitoring and vapor intrusion pathway risk assessment during the remedial action design or implementation phases in two locations:

- 1) Near residences on the northern portion of Lexington Court in the center of the carbon tetrachloride groundwater plume (near monitoring well MW-BW-53A), and
- 2) In the downgradient portion of the carbon tetrachloride plume in Marina (near monitoring Well MW-BW-49-A).

Please feel free to contact me if you have any questions at (916) 255-3676. We look forward to reviewing the Record of Decision and the Remedial Action Workplan.

Sincerely,



Daniel T. Ward, P.E.
Chief
Base Closure Unit
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